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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**RACHAEL MYLA STAGNER
aka Racquel Myla Stagner,**

Defendant.

Criminal No. 20-CR-165-J

**GOVERNMENT’S NOTICE OF INTENT TO OFFER EXPERT TESTIMONY
PURSUANT TO RULE 16(a)(1)(G)**

COMES NOW the United States of America, by and through its attorney, Kerry J. Jacobson, Assistant United States Attorney for the District of Wyoming, and gives notice of the government’s intent to offer expert testimony pursuant to Rule 16(a)(1)(G) in the above captioned case.

1. Sexual Assault Nurse Examiner (SANE) Mary Chismar Sweeney

Qualifications: Mary Chismar Sweeney is a Sexual Assault Nurse Examiner (SANE) with the Sagewest Hospital in Lander, Wyoming. Ms. Sweeney’s qualifications are more fully set forth in her Curriculum Vitae, which will be provided upon receipt.

Summary of Testimony: SANE Mary Sweeney conducted a sexual assault examination of the Defendant on July 5, 2020. SANE Sweeney may be called to testify regarding her training, experience and expertise in sexual assault investigations and examinations. SANE Sweeney may be called to testify regarding her observations and examination of the Defendant, including the results of her examination. SANE Sweeney's records pertaining to her interaction with the Defendant have been provided to the Defendant through discovery. SANE Sweeney may be asked to refer to her records as a part of her testimony.

CONCLUSION

The United States reserves the right to supplement the notice of expert witness testimony pursuant to the continuing duty to disclose pursuant to Rule 16(a), Federal Rules of Criminal Procedure. Investigations in criminal cases are ongoing and additional evidence may be discovered requiring additional expert witness testimony.

Respectfully submitted this 30th day of November, 2020.

MARK A. KLAASSEN
United States Attorney

By: /s/ Kerry J. Jacobson
KERRY J. JACOBSON
Assistant United States Attorney

CERTIFICATE OF SERVICE

This is to certify that on the 30th day of November, 2020, I served a true and correct copy of the foregoing **Government's Notice of Intent to Offer Expert Testimony Pursuant to Rule 16(a)(1)(G)** upon counsel of record by electronic filing.

/s/ Vickie L. Smith
UNITED STATES ATTORNEY'S OFFICE